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THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON

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BRAD SMITH, an individual,

Plaintiff,

v.

BIONA US, LLC, a Washington Limited Liability Company,

Defendant.

CASE NO. 2:18-cv-01606-JLR

STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINES

due

STIPULATION

The Court previously approved an extension of the deadline for filing the Joint Status Report to February 11, 2019. Consistent with that new deadline, the parties through their respective attorneys of record, hereby make the following stipulations and agreements as to other deadlines:

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STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINES – 1 Case No.: 2:18-cv-01606-JLR

VANGUARD LAW, PLLC PO BOX 939 POULSBO WA 98370 Office (206) 488-8344

| 1 | 1. The deadline for answering the Plaintiff's counterclaims should be extended from | | | | |
|----------------|---|---|-------------------|---|--|
| 2 | January 8, 2019 to January 22, 2019; | | | | |
| 3 | 2. The agreed upon Rule 26(f) discovery conference deadline is January 21, 2019; and | | | | |
| 4 | 3. The agreed upon initial disclosures deadline is now February 4, 2019. | | | | |
| 5 | | | | | |
| 6 7 | The extension of these deadlines is to allow time for the parties to discuss the possibility of early | | | | |
| 8 | resolution of this matter. | | | | |
| 9 | DATED this 7 th day of January, 2019. | | | | |
| 10 | Attorneys fo | or Plaintiff | Att | torneys for Defendant | |
| 11 | By: <u>s/ C. R</u> y | van Morgan | Ву | y: <u>s/ Gretchen Graham Salazar</u> | |
| 12 | C. Ryan Morgan, FSBA #0015527 | | | Gretchen Graham Salazar, WSBA #26186 | |
| 13 14 15 | Spence | cer Nathan Thal r Nathan Thal, #20074 | By: | : <u>s/Kasey D. Huebner</u> Kasey D. Huebner, WSBA #32890 | |
| 16 17 | | | | | |
| 18 | PROPOSED ORDER | | | | |
| 19 | The Court, having reviewed the records and files herein, and the foregoing stipulation, and | | | | |
| 20 | | | | | |
| 21 | deeming itself fully informed, hereby ORDERS, ADJUDGES and DECREES that: | | | | |
| 22 | 1.1 This Court has jurisdiction to issue an order in this matter; | | | | |
| 23 | 1.2 | This Court hereby ex | tends the deadlin | ne for Plaintiff to answer Defendant's | |
| 24 | counterclaims from January 8, 2019 to January 22, 2019; | | | | |
| 25 | 1.3 | The Rule 26(f) disco | very conference | deadline is now January 21, 2019; and | |
| 26 | | | | | |
| | H | | | | |

1 2 3 1.4 The initial disclosures deadline is now February 4, 2019. 4 DATED this 6 day of January, 2019. 5 6 7 James L. Robart United States District Judge 8 Presented by: 9 Attorneys for Plaintiff Attorneys for Defendant 10 By: s/ Gretchen Graham Salazar By: s/C. Ryan Morgan 11 C. Ryan Morgan, Gretchen Graham Salazar, FSBA #0015527 WSBA #26186 12 (Appearing *pro hac vice*) By: s/Kasey D. Huebner 13 Kasey D. Huebner, By: s/Spencer Nathan Thal 14 Spencer Nathan Thal, WSBA #32890 WSBA #20074 15 16 17 18 19 20 21

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